

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

GRUMP VENTURES, LLC,

Plaintiff,

v.

MASON COUNTY,

Defendant.

NO.

NOTICE OF REMOVAL
OF ACTION UNDER
28 U.S.C. § 1441(a)
(FEDERAL QUESTION)

[From Thurston County Superior Court
Cause No. 20-2-01958-34]

TO: CLERK OF THE ABOVE-ENTITLED COURT

PLEASE TAKE NOTICE that defendant hereby removes to this Court the state
court action described below:

1. An action was commenced in the Superior Court of the State of Washington
in and for Thurston County entitled *Grump Ventures, LLC v. Mason County*, attached hereto
as Exhibit 1. The complaint was filed on August 31, 2020.

2. The date upon which defendant received a copy of the complaint was August
31, 2020, when the Mason County Auditor's office received a copy of the same together
with a summons. A copy of the summons is attached hereto as Exhibit 2.

3. This action is a civil action of which the Court has original jurisdiction under
28 U.S.C. § 1331, and is one that may be removed to this Court by defendant pursuant to the

NOTICE OF REMOVAL OF ACTION - 1

MENKE JACKSON BEYER, LLP
807 North 39th Avenue
Yakima, WA 98902
Telephone (509)575-0313
Fax (509)575-0351

provisions of 28 U.S.C. § 1441(a), in that it states claims arising under the United States Constitution. The complaint alleges causes of action invoking 42 U.S.C. § 1983 as a result of the alleged violation of plaintiff's rights to equal protection and due process under the United States Constitution. *See* Exhibit 1 at ¶¶ 4.8, 5.11-5.17.

All other pleadings filed in the state court action are attached hereto as Exhibits 1-3.

DATED THIS 9th day of September, 2020.

s/ KENNETH W. HARPER
WSBA #25578
Menke Jackson Beyer, LLP
Attorneys for Defendant
807 North 39th Avenue
Yakima, Washington 98902
Telephone: (509) 575-0313
Fax: (509) 575-0351
Email: kharp@mjbe.com

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2020, I filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the following:

Mr. Brent Carson
Ms. Clara Park

brc@ynf.com
cpark@ynf.com

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

None.

s/KENNETH W. HARPER
WSBA #25578
Attorneys for Defendant
Menke Jackson Beyer, LLP
807 North 39th Avenue
Yakima, Washington 98902
Telephone: (509) 575-0313
Fax: (509) 575-0351
Email: kharp@mjbe.com